

JOHN ASHCROFT
Governor



Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

FREDERICK A. BRUNNER
Director

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

Springfield Regional Office
1155 East Cherokee Street
Springfield, MO 65807
417-883-4033

JAN 03 1989

HzW/Greene County
Hammer's Auto Works

December 29, 1988

Mr. Larry Lillich, Owner
Hammer's Auto Works, Inc.
2921 W. Chestnut Expressway
Springfield, MO 65802

Dear Mr. Lillich:

The Springfield Regional Office received an anonymous complaint through Steve Short of Springfield Sanitary Services on December 7, 1988, which alleged that waste oil and possibly other hazardous waste materials had been dumped at the northwest corner of the property with a little dumping also at the northeast corner of the property.

An investigation was made by Gale L. Roberts of the Springfield Regional Office on December 21, 1988. There was a layer of solidified petroleum product on the gravel parking lot at the northwest corner of the building with a small amount at the northeast corner. You indicated this material was grease and the consistency of the material did resemble that of grease. The material appeared to have been there for some time.

You indicated Hammer's Auto Works is a body shop that does not do mechanical work thus little antifreeze or waste oil is produced. The limited quantity that is produced is taken to another station for waste oil pickup. Solvents are extensively used and these are recovered in a five gallon capacity distillation unit. Bottoms from the distillation unit are accumulated in a 55 gallon drum and shipped to Reclaimed Energy Corporation, Connersville, Indiana, EPA identification number MOD981129075. The drum in the satellite accumulation area was properly labelled and the date of beginning accumulation (November 29, 1988) marked. During the period September 30, 1987, to December 8, 1988, five drums (400 lbs. each) had been shipped to Reclaimed Energy Corporation and manifests were on file for these shipments. Prior to using Reclaimed

2921 W CHESTNUT EXP.

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Energy Corporation for disposal, spent solvent was sold to a recovery firm in Carterville, Missouri. When this firm stopped buying solvent, you purchased the distillation unit and began shipping only the still bottoms to Reclaimed Energy Corporation. You indicated since you produced less than 100 Kg (220 lbs.) per month that you believed you did not need EPA and DNR numbers and that you had not registered to obtain these numbers. You further indicated you did not have resource recovery certification for your distillation unit.

Federal regulation 40CFR261.5(g)(2) allows conditionally exempt small quantity generators (those that generate less than 100 Kg or 220 pounds per month) to accumulate up to 1000 Kg or 2200 pounds before shipping. However, state regulation 10CSR25-4.261(2)(A)7.B specifically does not incorporate 40CFR261.5(g)(2) into the state regulations. This means a generator cannot accumulate more than the 100 Kg in Missouri without registering as a small quantity generator.

State regulation 10CSR25-9.010(1)(c) requires owner/operator of a resource recovery facility to submit an application for a resource recovery facility certificate. This includes small distillation units. There is no small quantity exemption for resource recovery.

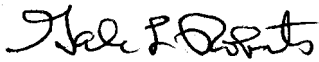
RECOMMENDATIONS:

- Do not deposit any more grease or other petroleum products on the property;
- (2) Register as a small quantity generator (form EPA8700/MDNRHWG-1 attached) or limit accumulation to no more than 100 Kg (220 lbs.);
 - (3) Submit an application for a resource recovery facility certificate (application form attached).

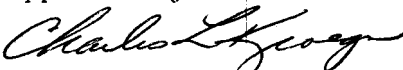
Please respond to these recommendations by February 15, 1989. If you have any questions, please feel free to call this office.

Sincerely

SPRINGFIELD REGIONAL OFFICE


Gale L. Roberts, P.E.
Environmental Engineer

Approved by:


Charles L. Kroeger
Unit Chief

CLK:GLR:jh

Attachments

cc: Mr. Steve Short, Springfield Sanitary Services
Waste Management Program

292 W CHESTNUT EKA.